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APR 15 2022

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

WILBERT GLOVER

Plaintiff(s),

vs.

Case No. 22cv974 NEB/BRT
(To be assigned by Clerk of District Court)

PUBLIC HOUSING AGENCY
TERRI GINDORFF
YING MOUA
CORINA SERRANO
DOMINGUE MCCORMICK

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in this lawsuit. Please attach additional sheets if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name WILBERT GLOVER
Street Address 435 UNIVERSITY AVENUE EAST
County, City RAMSEY, ST. PAUL
State & Zip Code MINNESOTA, 55130 - 4437
Telephone Number 651-341-0575



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 PUBLIC HOUSING AGENCY

Name

Street Address 555 WABASHA STREET. NORTH

County, City RAMSEY, ST. PAUL

State & Zip Code MINNESOTA 55102-1017

b. Defendant No. 2

Name TERRI GINDORFF

Street Address 555 WABASHA STREET NORTH

County, City RAMSEY - ST. PAUL

State & Zip Code MINNESOTA 55102-1017

c. Defendant No. 3

Name YING MOUA

Street Address 555 WABASHA STREET, NORTH

County, City RAMSEY - ST PAUL

State & Zip Code MINNESOTA 55102-1017

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

ADDITIONAL DEFENDANT
2D

CORINA SERRANO - DEFENDANT NO-4
555 WABASHA STREET NORTH
RAMSEY - ST. PAUL
MINNESOTA 55102 - 1017

DEFENDANT NO-5

DOMINQUE Mc.CORMICK
555 WABASHA STREET NORTH
RAMSEY - ST. PAUL
MINNESOTA 55102 - 1017

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

28 U.S.C. § 1331

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ Defendant(s) reside in Minnesota ☐ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. PLAINTIFF'S WILBERT GLOVER CRITERIA REFER TO SOCIAL SECURITY ACT AND THE DEVELOPMENTAL DISABILITIES SERVICES AND FACILITIES CONSTRUCTION AMENDMENTS OF 1970 ELIGIBILITY FOR HOUSING ASSISTANCE SECTION 8. DISABILITY CERTIFICATION

PLAINTIFF'S WILBERT GLOVER OR FAMILY MEMBER ARE DISABLED AND THE DISABILITY CAUSED FAILURE TO FIND A UNIT BY 9-12-2020 YOU MAY BE ELIGIBLE FOR AN ADDITIONAL 60 DAY EXTENSION A REASONABLE ACCOMMODATION

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

\$ 10,000,500.00
COMPENSATORY, PUNITIVE
AND NOMINAL DAMAGES:

PARAGRAPH 8.

ON JULY 22, 2021 PLAINTIFF'S WILBERT GLOVER RECEIVED A LETTER FROM PUBLIC HOUSING AGENCY TERRI GINDORFF STATED THAT PLAINTIFF'S WILBERT GLOVER HAVE PROGRAM ABUSE

PLAINTIFF'S WILBERT GLOVER CALL PUBLIC HOUSING AGENCY TERRI GINDORFF, I STATED MY NAME AND I HAVEN'T PROGRAM ABUSE - TERRI GINDORFF SAID "ALL YOU BLACK PEOPLE ARE ALIKE OR THE SAME TRYING TO DEFRAUD THE GOVERNMENT" I ASK TO SPEAK TO HER SUPERVISOR.

PARAGRAPH 9.

PUBLIC HOUSING AGENCY TERRI GINDORFF HANG UP TERMINATED THE CALL - PLAINTIFF'S WILBERT GLOVER CALL BACK 651 298 5096 TERRI GINDORFF SAID LESS START OVER AGAIN - PLAINTIFF'S WILBERT GLOVER SAID MAY I SPEAK TO YOUR BOSS SUPERVISOR TERRI GINDORFF SAID YOU BLACK ASS PEOPLE NEED TO GO BACK WHERE YOU COME FROM AND TERMINATED THE CALL AGAIN I CALL BACK AGAIN AND SOME OTHER LADY GAVE ME THE NAME YING MOVA PROGRAMS MANAGER -

PARAGRAPH 10.

PLAINTIFF'S WILBERT GLOVER
LEFT A VOICE MAIL ON HER
LINE STATED TERRI GINDORFF
SAID ALL YOU BLACK PEOPLE
ARE ALIKE OR THE SAME TRYING
TO DEFRAUD THE GOVERNMENT -

PLAINTIFF'S WILBERT GLOVER
ALSO LEFT A VOICE MAIL ON

* SUE JOHN 6SI 298 5079

PLAINTIFF'S WILBERT GLOVER

ALSO LEFT A VOICE MAIL ON

* DOMINIQUE MC CORMICK THE
DIRECTOR PHONE ~~WRO~~ VOICE MAIL
NO ANSWER REFUSE TO ADDRESS
PUBLIC SERVICES BASE OF RACE
DISCRIMINATION -

PARAGRAPH 11.

NOVEMBER 1, 2021 TERRI
GINDORFF SEND LANDLORD
ALISHER HAMRAKULOV A EMAIL
IF HE STAYS BEYOND THE
TERMINATION DATE - RESPONSIBLE
FOR THE FULL RENT

NOVEMBER 3, 2021 NOTICE OF
TERMINATION - TENANT NO LONGER
ELIGIBLE FOR ASSISTANCE FROM
TERRI GINDORFF BEFORE THE
HEARING - NOT ABOUT DOCUMENTS
HER BIAS DISCRIMINATORY
CONDUCT

PARAGRAPH 12.

DECEMBER 7, 2021 PLAINTIFF'S
WILBERT GLOVER INFORMAL
DOCUMENTS TO CORINA SERRANO
HCV PROGRAMS MANAGER SHOWED
POLICE REPORT WITH AFFIDAVIT
IDENTITY THEFT BEFORE I
RECEIVE DISABILITY CERTIFICATION
AND THE INFORMATION TERRI
GINDORFF OBTAIN WAS INACCURATE
HOWEVER SHE AND PUBLIC HOUSING
AGENCY STAFF WAS NOT TRYING
TO HEAR A BLACK AFRO AMERICAN
MAN CAUSE DISCRIMINATORY
CONDUCT.

PARAGRAPH 13.

DOMINQUE Mc CORMICK THE ADMINISTRATOR FAILURE TO TRAIN AND SUPERVISE CAUSE DELIBERATELY INDIFFERENT TO THE DISCRIMINATORY CONDUCT PATTERN OF UNCONSTITUTIONAL BEHAVIOR -

~~FAIL~~ FAILURE PROVIDE CUSTOMER SERVICES REASONABLE ACCOMMODATION OF A DISABILITY -

PARAGRAPH

Signed this 15 day of April 2022

Signature of Plaintiff Wilbert Glor

Mailing Address 435 UNIVERSITY AVENUE
ST. PAUL, MN. 55130 ^{EAS}

Telephone Number

651 341 0575

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.